

Cover Page

QHP Model Contract(s) First Round Comments

The following is the Covered California response to "First Round" comments received for the 2022 Amendment QHP Model Contract(s) for the Individual and Small Business Markets.

All documents will be posted to the Plan Management HBEX webpage:
<https://hbex.coveredca.com/stakeholders/plan-management/>.

| Section # | Comment | CovCA Response |
|------------------------------|---|--|
| Qualified Health Plan | | |
| 2.3 k) | The changed language seems to require that CC's Shop and Compare Tool be resident on the carrier's website. Our website contains our own multi-state subsidy calculator and a link to CC's web site and Shop and Compare Tool. We strongly encourage the language to continue to allow this as to do otherwise would create significant complexity & expense on our side without providing additional value to the consumer. | The contract change simply substituted the updated name "Shop and Compare Tool" for "subsidy calculator". No other change was made to the section and a link will satisfy this requirement. |
| 2.4.1 b)i. | The changed language removes the integrated delivery system exception to including the plan design name on the member ID card. As an integrated delivery system has all plan design detail available at the point of service, there is no value to the consumer in having plan design information on the card. Requiring this would add very material systems change costs as well as very material ID card production and mailing costs. | The requirement to include product names on identification cards was struck for all carriers. There's no impact to integrated delivery systems, as they were always exempt from this, no contract change will be made. |
| 3.1.4 | Operational Requirements and Liquidated Damages - Healthcare Evidence Initiative Data (HEI Data) Submission Several commenters believe that adding a liquidated damages clause on HEI data submission is not needed as there is already a penalty for HEI data failures in Attachment 14. We recommend that the penalty be deleted from either the main contract or from Attachment 14. | The new Healthcare Evidence Initiative Data (HEI Data) Submission subsection of Section 3.1.4 of the model contract will be removed. |
| 5.1.3 c) | It appears that it may be your intention to leave the 2022 participation fee at 3.25% rather than the previously planned reduction to 3.0%. We strongly encourage that the most recent plan as stated in the annual budget be carried out as failure to do so would directly impact the cost of coverage to many consumers. | The final participation fee rate for 2022 will be displayed in the Board approved version of the amendment. The rate proposed is 3.0%. |